

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

UNITED STATES' DESIGNATION OF TESTIFYING EXPERTS

Pursuant to this Court's November 18, 2021 Scheduling Order, ECF No. 125; the Stipulated Extension of Expert Discovery Deadline, ECF No. 161; and the Second Stipulated Extension of Expert Discovery Deadline, ECF No. 214, the United States hereby files its designation of testifying experts.

Designation of Testifying Experts

1. **Dr. Kara B. Ayers.** Dr. Ayers is an Associate Professor of Pediatrics at Cincinnati Children's Hospital Medical Center (CCHMC) in the Division of Developmental and Behavioral Pediatrics, and an affiliated faculty member of the University of Cincinnati College of Medicine Department of Pediatrics. In connection with these roles, she is Associate Director of the University of Cincinnati Center for Excellence in Developmental Disabilities and the Director of the Center for Dignity in Healthcare for People with Disabilities. Dr. Ayers is expected to testify regarding the impact of the revised voter assistance oath in SB 1 on voters with disabilities.
2. **Dr. William G. Eggington.** Dr. Eggington is an emeritus professor of English Language and Linguistics at Brigham Young University. Dr. Eggington is expected to testify regarding the impact of SB 1 on limited English proficiency voters and voters with low English literacy who need assistance in the voting process.
3. **Dr. Eitan Hersh.** Dr. Hersh is a tenured professor of political science at Tufts University whose scholarly research focuses on U.S. elections and using individual-level data such as voter registration records to study politics. Dr. Hersh is expected to testify regarding

the effects of SB 1 on acceptance and rejection of applications for ballots by mail and mail ballot carrier envelopes.

4. **Tammy Patrick.** Ms. Patrick is a Senior Advisor at Democracy Fund and formerly a Senior Fellow at the Bipartisan Policy Center, a Commissioner on the Presidential Commission on Election Administration, and the Federal Compliance Officer for the Maricopa County Elections Department. Ms. Patrick is expected to testify regarding the consistency of SB 1's voter assistance oath and vote-by-mail identification document number requirements with sound election administration practices and principles.

Also pursuant to this Court's November 18, 2021 Scheduling Order, the United States shall on this day serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Date: February 28, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Michael E. Stewart

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